

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,
Debtor.

Case No. 23-13237-pmm

Chapter 11

Debtor's Motion to Pay Pre-Petition Debt Owed to Critical Vendor

AND NOW, Debtor Tri-State Paper, Inc., by and through its attorney, moves this Court for entry of an order allowing it to pay a pre-petition debt owed to a critical vendor. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 11 on October 27, 2023.
2. As reflected on Schedule A/B, the Debtor's largest asset is real property located at 4500 North Third Street in Philadelphia, Pennsylvania, which is used as a warehouse. Routine fire sprinkler maintenance is a requirement of the Debtor's insurance policy on the property.
3. Oliver Fire Protection and Security has billed the Debtor for the following services performed before the bankruptcy was filed: (a) \$1,595 for an inspection performed on October 20, 2023; \$3,120 for repair service performed on October 6, 2023; and \$765 for repair service performed on September 18, 2023. Exhibit A.
4. To keep its insurance policy in good standing, the Debtor will likely need to use Oliver's services over the next few months. However, Oliver has indicated to the Debtor that they will not provide further services to the Debtor because of the outstanding invoices.
5. The bankruptcy code authorizes the Court to allow payment for administrative expenses of preserving the estate upon notice and hearing. 11 U.S.C. § 503(b)(1)(A).
6. Because service of the sprinkler system is essential to maintain insurance on the largest asset in this case, Oliver is a critical vendor.
7. Payment to Oliver is necessary to preserve the estate because termination of the Debtor's business relationship with Oliver would complicate the Debtor's reorganization by jeopardizing its ability to maintain insurance.

8. For those reasons, the Debtor asks the Court to authorize payment to Oliver as an administrative expense in the amount of \$5,480.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in in its as may be necessary and proper under the law.

Date: December 11, 2023

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com